

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ZHI ZHONG QIU,

Plaintiff,

v.

ROBERT DIAMOND, JR., and ATLAS
MERCHANT CAPITAL LLC

Defendants.

Case No. 19-cv-2050-ER

**DECLARATION OF ROSS A. WILSON IN SUPPORT OF DEFENDANT ATLAS
MERCHANT CAPITAL LLC'S MOTION TO DISMISS THE COMPLAINT**

I, Ross A. Wilson, declare as follows:

1. I am an attorney at the law firm Paul, Weiss, Rifkind, Wharton & Garrison LLP, which represents Defendant Atlas Merchant Capital LLC ("Atlas") in the above-captioned action. I am a member of the Bar of the State of New York, and am admitted to practice before this Court. I respectfully submit this declaration in support of Atlas's Motion to Dismiss the Complaint.

2. Attached hereto as **Exhibit A** is a true and correct copy of a letter agreement, dated June 23, 2016, between Atlas-Ruton Capital LLC and Atlas Merchant Capital Holdings, Ltd.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 29, 2019.



Ross A. Wilson